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Our File No.: 4259070001

February 28, 2008

**Via Electronic Comment Filing System**

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

**Re: The Telephone Connection of Los Angeles, Inc.  
The Telephone Connection Local Services, LLC  
CPNI Compliance Certification  
EB Docket No. 06-36**

Dear Ms. Dortch:

On behalf of The Telephone Connection of Los Angeles, Inc. and The Telephone Connection Local Services, LLC, and pursuant to 47 C.F.R. § 64.2009(e), enclosed is their 2008 CPNI compliance certification.

Very truly yours,



Eliot J. Greenwald

Enclosure

cc: Enforcement Bureau Telecommunications Consumers Division  
Best Copy and Printing, Inc. (via e-mail)  
Marc O'Krent (via e-mail)

Boston  
Hartford  
Hong Kong  
London  
Los Angeles  
New York  
Orange County  
San Francisco  
Santa Monica  
Silicon Valley  
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A/72449903.1

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2008.

Date filed: February 28, 2008

Name of companies covered by this certification: The Telephone Connection of Los Angeles, Inc. and  
The Telephone Connection Local Services, LLC

Form 499 Filer ID: 819856

Name of signatory: Marc O'Krent

Title of signatory: President

I, Marc O'Krent, certify that I am an officer of the companies named above, and acting as an agent of the companies, that I have personal knowledge that the companies have established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the companies' procedures ensure that the companies are in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The companies have not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

If affirmative: Not applicable

The companies have not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

If affirmative: Not applicable

Signed 

**THE TELEPHONE CONNECTION OF LOS ANGELES, INC.  
THE TELEPHONE CONNECTION LOCAL SERVICES, LLC  
STATEMENT OF CPNI COMPLIANCE PROCEDURES**

The Telephone Connection of Los Angeles, Inc. ("TTC") and The Telephone Connection Local Services, LLC ("TTC Services") provide paging, local exchange and interexchange services to residential and business customers located in California.

TTC and TTC Services have a policy of providing regular written CPNI notices to all customers and obtain approval from all customers to use CPNI for marketing purposes. TTC and TTC Services also provide existing customers with the ability to change or rescind their consent to the respective company's use of their CPNI at any time. TTC's and TTC Services' CPNI notices explain the customers' CPNI rights in accordance with the FCC's CPNI Rules, including their right to restrict the use and disclosure of, and access to their CPNI. These notices also provide information on how customers can choose to not receive marketing from TTC or TTC Services that is based upon TTC and TTC Services's use of their CPNI. From time to time, TTC and TTC Services may use CPNI to market communications-related services outside of those services to which a customer already subscribes but only where the customer has granted approval pursuant to instructions in the CPNI notices. TTC and TTC Services maintain records of customer approval and the delivery of its CPNI notices for at least two years.

TTC and TTC Services have implemented a system by which the status of a customer's CPNI approval can be clearly established prior to the use or disclosure of that customer's CPNI. Specifically, TTC and TTC Services maintain a database for tracking CPNI restricted accounts. Unless, as discussed below, a one-time approval of CPNI is obtained, TTC and TTC Services representatives who market using CPNI, review this database and refrain from marketing to customers with a CPNI restricted account.

In accordance with the CPNI rules, upon obtaining a customer's oral authorization, customer service representatives of TTC and TTC Services may access a customer's CPNI during the course of an inbound or outbound telephone conversation, solely for the duration of that conversation. Each such TTC or TTC Services representative must provide the disclosures required by 64.2008(c) of the CPNI rules including informing customers of their right to deny access to the CPNI before requesting this one-time consent.

TTC and TTC Services may, as permitted by the CPNI rules, use CPNI without customer approval (1) to bill and collect for services rendered; (2) to protect the rights or property of TTC and TTC Services, other users or other carriers from unlawful use; (3) to provide customer premises equipment and protocol conversion; (4) to provision inside wiring, maintenance and repair services; and (5) to market services formerly known as adjunct-to-basic services, such as, but not limited to, speed dialing, computer-provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller I.D., call forwarding, and certain Centrex features.

TTC and TTC Services have established procedures to require a password prior to disclosing call detail information or other CPNI to a customer during a customer-initiated call. Similarly, TTC and TTC Services also have a password requirement for online account access. TTC and TTC Services will also provide call detail information to a customer by mailing such information to the address of record or calling the telephone number of record upon customer request or if the customer is unable to present a proper password. Lastly, TTC and TTC Services will provide call detail information to a customer at a retail location upon presentation of a valid photo ID that matches the name on the account.

TTC and TTC Services have procedures for customer establishment of a password without the use of readily available biographical information or account information. TTC and TTC Services also have procedures for notifying the customer whenever a password, customer response to a back-up means of notification, online account, or address of record is created or changed.

TTC and TTC Services have established procedures for notifying the United States Secret Service and the Federal Bureau of Investigation in the event of a breach of CPNI protection within seven days of reasonably determining that there has been a breach. Customer notification shall be delayed for a minimum of seven full business days

after notification to the USSS and the FBI. TTC and TTC Services have established procedures for maintaining records of such breaches for a minimum of two years.

TTC and TTC Services do not share, sell, lease or otherwise provide CPNI to any third parties for the purposes of marketing any services.

TTC and TTC Services maintain a record for at least year of their respective sales and marketing campaigns that use customers' CPNI. TTC and TTC Services have established a supervisory review process to ensure any marketing campaigns are consistent with the FCC's CPNI rules. This process includes a periodic review by the company's senior marketing personnel who are responsible for approving any proposed outbound marketing requests that would require customer approval. Additionally, TTC and TTC Services marketing supervisors monitor customer calls from time-to-time to assure that customer accounts and information are being accessed properly by the employees and consistent with TTC's and TTC Services' CPNI policies.

All TTC and TTC Services employees who have access to CPNI receive training about CPNI compliance. Specifically, all new employees are provided with CPNI training at new-hire orientation. Moreover, a summary of TTC's and TTC Services' CPNI policies are included in their Employee Handbook, and all employees are required to acknowledge in writing that they have read and understand the information in the Employee Handbook. All TTC and TTC Services employees are required to maintain the confidentiality of all information, including customer information that is obtained as a result of their employment by TTC and TTC Services. Employees who do not abide by these policies or otherwise permit the unauthorized use or disclosure of CPNI will be subject to discipline, including possible termination.

TTC and TTC Services have in place procedures to ensure that they will provide written notice to the FCC within five business days of any instance where their respective opt-out mechanisms do not work properly to such a degree that their respective customers' inability to opt-out is more than an anomaly. These procedures ensure that the notice will be in the form of a letter, and will include: (i) TTC's and TTC Services' name; (ii) a description of the opt-out mechanism(s) used; (iii) the problem(s) experienced; (iv) the remedy proposed and when it will be or was implemented; (v) whether the relevant state commission(s) has been notified; (vi) whether TTC and TTC Services have taken any action; (vii) a copy of the notice provided to customers; and (viii) contact information. TTC and TTC Services will submit the above letter even if it offers other methods by which its customers may opt-out.